

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 29, 1996

Mr. Glenn A. Miller
Assistant Secretary
State of Louisiana
Department of Environmental Quality

Dear Mr. Miller:

Thank you for your letter of September 15, 1995 regarding site-specific risk assessments. We regret the delay in responding to the important questions you raise. As you know, site-specific risk assessments are a significant element of EPA's strategy for the permitting of facilities that burn hazardous wastes.

The applicable guidance for conducting site-specific risk assessments is an April 1994 draft compendium entitled "Exposure Assessment Guidance for RCRA Hazardous Waste Combustion Facilities" including attachments A, B, and C. Attachment A contains a list of compounds that should be considered when conducting trial burns. Attachment B is the trial burn guidance itself. Attachment C contains guidance for conducting a screening level analysis of risk.

It should be emphasized that the above guidance is in draft form. It may be used where it is found to be helpful, although at the present time it is somewhat dated. For example, a three volume exposure assessment for dioxins was issued by EPA as an external review draft in September 1994 which contains alternative procedures and much data for assessing exposure to dioxin emissions from combustion sources. Also, a new air dispersion and deposition model (ISC3) is now available as a replacement for the model discussed in the 94 guidance. Your agency may also be aware of the workshop held in Kansas City in March of last year during which a variety of informational materials were made available to both permit writers and risk assessors. The workshop was attended by many State agencies. Finally, EPA has completed a risk assessment in support of proposed standards for hazardous waste burning incinerators and cement kilns which contains additional information that may be helpful when doing site-specific assessments.

EPA encourages the use of the most up-to-date technical information available for risk assessments performed under the combustion strategy, whenever practical. Your letter highlights the difficulty in making sure that all implementing agencies have the most current information. My office is taking steps to improve this situation by preparing an information update which will

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make available additional informational materials on site-specific risk assessments to EPA Regions and the States.

It is important to note that EPA also encourages the use of actual field data for assessing exposures and for evaluating the reasonableness of modeling results. For example, EPA has concluded that modeling of mercury compounds is presently a highly uncertain endeavor. Also, there is very limited data on bioaccumulation of many organic compounds that are commonly found in emissions from combustion sources.

Finally, EPA recommends that site-specific risk assessments be done in the context of other relevant guidance, such as EPA's overall guidance on risk characterization, which emphasizes the need to recognize the, uncertainty inherent in any assessment of risk.

I know that things are changing rapidly with respect to risk assessment and I want to assure you that we are working to update our existing risk assessment guidance to reflect theme changes. I hope this clarifies the status and applicability of guidance for conducting site-specific risk assessments. Again, we apologize for the long delay in answering your letter. If you require anything further, please contact David Layland at (202) 260-4796 or Val DeLaFuente at (703) 308-7245.

Sincerely,

Michael Shapiro, Director
Office of Solid Waste